October 14, 2009

Mr. Bernie Buescher Colorado Secretary of State Colorado Department of State 1700 Broadway Denver, CO 80290

RE: Draft Rule 37.

Dear Secretary Buescher:

Draft rule 37 must not include a partial list and/or description of standards and requirements. This partial requirement can be used as a way of arguing that the partial list is the complete list, and it is not.

Instead, the rule must list the specific documents where the complete set of standards and requirements are defined. Bernie Buescher

Al Kolwicz and Harvie Branscomb

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